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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
PURDUE PHARMA, L.P., et al.,¹)	Case No. 19-23649 (RDD)
)	
Debtors.)	(Jointly Administered)
)	

**THE AD HOC GROUP OF NON-CONSENTING STATES' JOINDER IN, AND
STATEMENT WITH RESPECT TO, *EX PARTE* MOTION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF PURDUE PHARMA, *ET AL.* FOR
AN ORDER AUTHORIZING EXAMINATIONS PURSUANT TO FEDERAL RULES OF
BANKRUPTCY PROCEDURE 2004 AND 9016**

To the Honorable Robert D. Drain, United States Bankruptcy Judge:

The Ad Hoc Group of Non-Consenting States (the “**Non-Consenting States**”)² submits
this joinder in, and statement with respect to, the *Ex Parte Motion of the Official Committee of
Unsecured Creditors of Purdue Pharma, et al. for an Order Authorizing Examinations Pursuant*

¹ The debtors in these chapter 11 cases (“**Debtors**” or “**Purdue**”), along with the last four digits of their federal tax identification numbers, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.P. (1868), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (6166), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ principal offices are at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Idaho, Illinois, Iowa, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Hampshire, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, and Wisconsin.

to Federal Rules of Bankruptcy Procedure 2004 and 9016 [Docket No. 981] (the “**Motion**”)³
submitted by the Official Committee and respectfully state as follows:

STATEMENT AND JOINDER

1. The Non-Consenting States join the Official Committee in its motion to establish the mechanics required for obtaining discovery under Bankruptcy Rule 2004 from the Initial Covered Sackler Persons.

2. In addition to having an interest in obtaining and reviewing documents requested by the Official Committee, the Non-Consenting States have also requested information and documents from the Initial Covered Sackler Persons. Many of these requests relate to ongoing work of the Non-Consenting States with their review of the liability of the Initial Covered Sackler Persons and their offer under the proposed Settlement Framework. The Non-Consenting States have had ongoing discussions with the Initial Covered Sackler Persons and continue to work through and attempt to resolve discovery issues informally. Given these issues and the Court’s statements at the March 18, 2020 hearing, the Non-Consenting States contemplated filing their own motion to obtain discovery under Bankruptcy Rule 2004 to facilitate that process and ensure the production is complete.

3. In light of the Motion, to reduce the burden on the Court of addressing multiple Bankruptcy Rule 2004 motions for discovery of the Initial Covered Sackler Persons, the Non-Consenting States join the Motion and respectfully request that they be permitted to take discovery under any order authorizing discovery of the Initial Covered Sackler Persons, for the reasons set forth in the Motion.

³ Capitalized terms used herein not otherwise defined have the meaning ascribed to them in the Motion.

RESERVATION OF RIGHTS

4. The Non-Consenting States reserve all of their respective rights, claims, defenses, and remedies, including without limitation, the right to seek additional discovery (including depositions) from the Initial Covered Sackler Persons and others.

CONCLUSION

For the reasons set forth above and in the Official Committee's Motion, the Non-Consenting States respectfully request that the Court enter an order that authorizes the Official Committee, the Debtors, and the Non-Consenting States to undertake a Bankruptcy Rule 2004 examination of the Initial Covered Sackler Persons. Attached hereto as **Exhibit A** is a clean and black line proposed form of order adding the Non-Consenting States to the proposed order attached to the Motion.

Dated: March 26, 2020
New York, New York

/s/ Andrew M. Troop
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